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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DISABILITY RIGHTS OREGON,
METROPOLITAN PUBLIC DEFENDER
SERVICES, INC., and A.J. MADISON,

3:02-cv-00339-MO (Lead Case)
3:21-cv-01637-MO (Member Case)

Plaintiffs,

v.

**MARION COUNTY'S OBJECTION TO
PLAINTIFFS' PROPOSED ORDER**

DAVID BADEN, in his official capacity as head
of the Oregon Health Authority, and DOLORES
MATTEUCCI, in her official capacity as
Superintendent of the Oregon State Hospital

Defendants.

JAROD BOWMAN and
JOSHAWN DOUGLAS- SIMPSON,

3:21-CV-01637-MO (Member Case)

Plaintiffs,

v.

DOLORES MATTEUCCI, Superintendent of the
Oregon State Hospital, in her individual and
official capacity, DAVID BADEN, Director of
the Oregon Health Authority, in his official
capacity, and PATRICK ALLEN in his
individual capacity,

Defendants.

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ORDER**

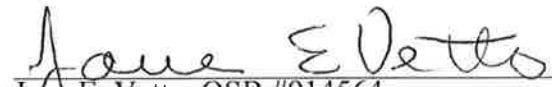
OBJECTION

Amicus Marion County, by and through counsel, respectfully submits the following objection to Plaintiffs' Proposed Order Determining Supremacy Clause Issues. (Dkt. No. 442). Although the proposed order indicates that the motion was granted only in part, it is not explicit about which portions of their request were denied by the Court—specifically, that the request to compel the Marion County Sheriff's Office to conduct transport of individuals back from the Oregon State Hospital was denied. Accordingly, Marion County requests that the Court include a provision in its final order explicitly memorializing its ruling on the transport issue. Attached to this objection is a copy of Marion County's proposed edits to the Plaintiffs' order adding the requested language.

Dated this 7th day of September, 2023

Respectfully submitted,

JANE E. VETTO
MARION COUNTY LEGAL COUNSEL


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Attorney for Amicus Marion County

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